

SHEMARIAH DEROUX,	
	Plaintiff,
v.	Civil Action No.
BOBBCAT FILMS, LLC, OWN, INC., and SHANE JOHNSON aka SHANE JOHNSON-BOBB	1:25-cv-01566-LMM
	Defendant.

PLAINTIFF'S MOTION TO DISMISS WITHOUT PREJUDICE
PURSUANT TO FRCP 41(a)(2)

COMES NOW, SHEMARIAH DEROUX (hereinafter referred to as "Plaintiff"), by and through undersigned counsel, and pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, respectfully moves this Court for an order dismissing this action without prejudice. In support of this motion, Plaintiff states as follows:

1.

Plaintiff's original Complaint was filed on March 24, 2025, and an Amended Complaint was filed on April 22, 2025. The Complaints include claims against Defendants for copyright infringement and other related causes of action.

2.

Plaintiff seeks to voluntarily dismiss this action without prejudice in order to obtain further information and resources necessary to support her claims.

3.

Rule 41(a)(2) permits dismissal by court order at the Plaintiff's request, on terms the court considers proper, where the opposing party has filed an answer or motion for summary judgment.

4.

Dismissal without prejudice will not result in prejudice to the Defendants, and no party will be unfairly disadvantaged by the dismissal.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order dismissing this action without prejudice and granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

This 20th day of August 2025.

/s/Natalie K. Howard

Natalie K. Howard, Esq. GA Bar No. 889108
Attorney for Plaintiff

The Law Office of Natalie K. Howard, LLC

3675 Crestwood Parkway NW, Suite 400

Duluth, GA 30096

Phone: 678-252-2150

Fax: 678-252-2183

nhoward@nkhlegal.com

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing pleading complies with the font and point selections approved by the Court in Local Rule 5.1C. This pleading has been prepared in Times New Roman 14-point font.

This 20th day of August 2025.

/s/Natalie K. Howard

Natalie K. Howard, Esq. GA Bar No. 889108
Attorney for Plaintiff

The Law Office of Natalie K. Howard, LLC

3675 Crestwood Parkway NW, Suite 400

Duluth, GA 30096

Phone: 678-252-2150

Fax: 678-252-2183

nhoward@nkhlegal.com

CERTIFICATE OF SERVICE

The foregoing PLAINTIFF SHEMARIAH DEROUX'S MOTION TO DISMISS WITHOUT PREJUDICE was filed using the Court's CM/ECF system, which automatically and contemporaneously sends electronic notification and a service copy of this filing to counsel of record:

Robin L. Gentry, Esq.

rgentry@founderslegal.com

E. Allen Page, Esq.

page@bmelaw.com

This 20th day of August, 2025.

/s/Natalie K. Howard

Natalie K. Howard, Esq. GA Bar No. 889108

Attorney for Plaintiff

The Law Office of Natalie K. Howard, LLC
3675 Crestwood Parkway NW, Suite 400
Duluth, GA 30096
Phone: 678-252-2150
Fax: 678-252-2183
nhoward@nkhlegal.com